

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

PRESIDENT AND FELLOWS OF  
HARVARD COLLEGE

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF  
HEALTH AND HUMAN SERVICES, et al.

Defendants.

Case No. 1:25-cv-11048

**CONSENT MOTION TO EXTEND DEFENDANT USDA’S DEADLINE FOR  
PRODUCTION OF THE ADMINISTRATIVE RECORD**

Defendant United States Department of Agriculture (“USDA”) respectfully requests an additional day to produce its portion of the administrative record, such that it is due May 20, 2025. USDA was not added as a party to this suit until after the First Amended Complaint, Dkt. No. 59 (May 13, 2025), and the agency requests additional time to ensure the completeness of its record. The undersigned counsel conferred with Plaintiff’s counsel, and Plaintiff consents to this motion.

Dated: May 19, 2025

Respectfully submitted,

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Acting Associate Attorney General

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Deputy Associate Attorney General

YAAKOV M. ROTH  
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Civil Division

JOSEPH BORSON

Assistant Director, Federal Programs Branch

*/s/ Eitan R. Sirkovich*

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